

Joshua R. Harris, Esquire
Nevada Bar No. 9580
Richard Harris Law Firm
801 South Fourth Street
Las Vegas, NV 89101
Telephone: (702) 444-4444
Facsimile: (702) 444-4455
Email josh@richardharrislaw.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
LAS VEGAS

MIRA KHANY,)	
)	
Plaintiff,)	Civil Docket No. 2:22-cv-01781-VCF
)	
v.)	
)	
KILOLO KIJAKAZI,)	Assigned to Judge Cam Ferenbach
Acting Commissioner Social Security,)	
)	
Defendant.)	

PLAINTIFF'S UNOPPOSED MOTION FOR A THIRTY (30) DAY EXTENSION TO FILE
PLAINTIFF'S MOTION FOR REMAND TO AGENCY AND MEMORANDUM IN SUPPORT
ON OR BEFORE MAY 1, 2023

COMES NOW Plaintiff, Mira Khany, through her undersigned counsel, and moves this Court for an extension of time of thirty (30) days to file Plaintiff's Motion for Remand to Agency and Memorandum in Support on or before May 1, 2023.

1. Plaintiff's counsel has recently seen a significant increase in disability matters that have been initiated in Federal District Court.

2. Due to the recent increase in Disability matters that have been initiated and Federal District Court and the recent changes under the updated F.R.C.P 7.1, Supplemental Rules for Social Security Actions under 42 U.S.C. §405(g), the undersigned has seen a lot of federal court opening Memorandums all coming due at the same time.

3. The undersigned does not wish to have his workload affect the interests of this severely disabled plaintiff.

Khany v. Kijakazi
Civil Docket No. 2:22-cv-01781-VCF

MOTION FOR EXTENSION

WHEREFORE, Plaintiff's moves this Court for an Order granting Plaintiff an additional thirty (30) days to file Plaintiff's Motion for Remand to Agency and Memorandum in Support on or before May 1, 2023.

By: /s/ Joshua R. Harris
Joshua R. Harris, Esquire
Nevada Bar No. 9580
Richard Harris Law Firm
801 South Fourth Street
Las Vegas, NV 89101
Telephone: (702) 444-4444
Facsimile: (702) 444-4455
Email josh@richardharrislaw.com

IT IS SO ORDERED.

DATED 4-3-2023

CERTIFICATE OF SERVICE

I hereby certify that on **March 31, 2023**, a copy of the foregoing **Plaintiff's Motion for Extension** has been electronically filed and is available for viewing and downloading from the Electronic Case Filing system of this Court. The Social Security Administration's Office of the General Counsel and the United States Attorney's Office are registered to receive electronic service with the Electronic Case Filing system of this Court. Therefore, SSA and its counsel have been fully served and nothing further is required.

Respectfully submitted,

By: /s/ Joshua R. Harris
Joshua R. Harris, Esquire
Nevada Bar No. 9580
Richard Harris Law Firm
801 South Fourth Street
Las Vegas, NV 89101
Telephone: (702) 444-4444
Facsimile: (702) 444-4455
Email josh@richardharrislaw.com

Attorney for Plaintiff, Mira Khany

Joshua R. Harris, Esquire
Nevada Bar No. 9580
Richard Harris Law Firm
801 South Fourth Street
Las Vegas, NV 89101
Telephone: (702) 444-4444
Facsimile: (702) 444-4455
Email josh@richardharrislaw.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
LAS VEGAS


MIRA KHANY,)	
)	
Plaintiff,)	Civil Docket No. 2:22-cv-01781-VCF
)	
v.)	
)	
KILOLO KIJAKAZI,)	Assigned to Judge Cam Ferenbach
Acting Commissioner Social Security,)	
)	
Defendant.)	

PLAINTIFF'S UNOPPOSED MOTION FOR A THIRTY (30) DAY EXTENSION TO FILE
PLAINTIFF'S MOTION FOR REMAND TO AGENCY AND MEMORANDUM IN SUPPORT
ON OR BEFORE MAY 1, 2023

Upon consideration of Plaintiff's Unopposed Motion for a Thirty (30) Day Extension to file Plaintiff's Motion for Remand to Agency and Memorandum in Support, it is hereby ORDERED that Plaintiff's Motion is GRANTED. Plaintiff shall file her Motion for Remand to Agency and Memorandum in Support on or before May 1, 2023.

SO ORDERED this 3rd day of April, 2023.

BY THE COURT,



HONORABLE CAM FERENBACH
UNITED STATES JUDGE

Khany v. Kijakazi
Civil Docket No. 2:22-cv-01781-VCF

PROPOSED ORDER